

ACETO CORPORATION

4 Tri Harbor Court
Port Washington, NY 11050
Tel: (516) 627 6000
Fax: (516) 627 6093
www.aceto.com

March 7, 2014

Via Email and UPS Mail

Ms. Bonnie Hriczko
Removal Action Branch
U.S. Environmental Protection Agency, Region II
2890 Woodbridge Avenue, MS-211
Edison, New Jersey 08837

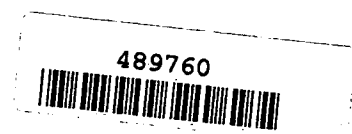
Re: **Response of Aceto Corporation to the Request for Information
pursuant to Section 104(e) of CERCLA relating to the
Superior Barrel and Drum ("SBD") Site
Elk, Gloucester County, New Jersey**

Dear Ms. Hriczko:

Enclosed please find a response to the Request for Information pursuant to Section 104(e) of CERCLA relating to the Superior Barrel and Drum ("SBD") Site located in Elk, New Jersey, received by the Aceto Corporation ("Aceto") on January 4, 2014. As you know, the United States Environmental Protection Agency (the "Agency") granted the Company an extension of thirty (30) days, to March 16, 2014, in which to provide a response to this Request for Information.

To the best of our knowledge following reasonable inquiry, Aceto has never conducted any business transactions with SBD for the disposal, treatment, or storage of any drums or other containers. It is our understanding from the nexus documents (i.e., four photographs) provided by the Agency and attached to the response as Exhibit 1 that a single drum with an Aceto label came to be located at the SBD Site. Given that Aceto has never conducted any business with SBD, the most reasonable explanation for the presence of this drum is that it was sent there (directly or indirectly) by one of Aceto's customers.

The label on the drum in the photographs provided by the Agency identifies the contents of the drum as Benzophenone Flake. Attached to the response as Exhibit 2 is a list of customers to whom the Company sold Benzophenone Flake. As is evident from the "Port of Destination" marked on the label, this drum and its contents were sent to an Aceto customer located in



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Chicago, Illinois. Exhibit 2 identifies two customers located in Chicago to whom Aceto sold this product.

Liability for cleanup costs under the Comprehensive Environmental Response, Compensation, and Liability Act, 42 U.S.C. § 9601 et seq. ("CERCLA"), extends to four classes of "covered persons":

- (1) the owner and operator of a facility at which a release or threatened release of a hazardous substance exists;
- (2) the owner or operator of such a facility any time in the past when hazardous substances were disposed of;
- (3) any person or entity who "arranged for" the treatment or disposal of a hazardous substance at the facility; and
- (4) any person who transported hazardous substances to the facility.

Aceto never owned or operated the SBD Site, never transported hazardous substances for disposal or treatment at the SBD Site, and never arranged for the treatment or disposal of a hazardous substance at the SBD Site. Therefore, since it falls under none of the four classes of "covered persons," Aceto is not a liable party under CERCLA.

An argument could be made that Aceto is an "arranger" because the drum came to be located at the SBD Site. This argument fails, however, because Aceto sold a useful product (i.e. Benzophenone Flake) to its customer, and did not "arrange for" the disposal of a hazardous substance at the facility. The United States Supreme Court has held that an entity must have an intent to dispose of a hazardous substance in order to be held liable as an arranger. Burlington N. & Santa Fe Ry. Co. v. United States, 129 S. Ct. 1870 (2009). A person may be held liable for cleanup costs as an "arranger" only if the material in question constitutes waste rather than a useful product. California Dept. of Toxic Substances Control v. Alco Pacific, Inc., 508 F.3d 930 (9th Cir. 2007). The Company sold Benzophenone Flake to its customer as a useful product in the normal course of business, and did not intend to dispose of it as waste. As such, Aceto cannot be held liable for cleanup costs as an arranger under CERCLA.

The photographs of the drum at the SBD Site show that it was not filled with Benzophenone Flake, but rather contained a small, portable gasoline container and hosing. Thus, there is no evidence that the drum contained a hazardous substance when it arrived at the SBD Site.

In light of the foregoing, Aceto is not a "covered person" under CERCLA and, therefore, is not liable for the costs of remediation.

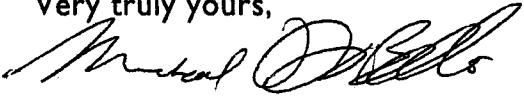
If you have any questions, please do not hesitate to contact me.

Ms. Bonnie Hriczko

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Very truly yours,

A handwritten signature in black ink, appearing to read "Michael DiBello", written in a cursive style.

Michael DiBello

VP, Associate General Counsel – Regulatory

(516) 478 – 9546

Enclosures

cc: Mr. William Tucker, Esq., USEPA

Response of Aceto Corporation
to the Request for Information pursuant
to Section 104(e) of CERCLA
Relating to the Superior Barrel and Drum ("SBD") Site,
Elk, Gloucester County, New Jersey

REQUEST FOR INFORMATION

General Information about the Company

1. a. State the correct legal name of the Company.

RESPONSE:

Aceto Corporation.

- b. Identify the legal status of the Company (corporation, partnership, specify if other) and the state in which the Company was organized.

RESPONSE:

The Company was incorporated in the State of New York in 1947.

- c. State the name(s) and address(es) of the officer(s) of the Company.

RESPONSE:

Name	Title	Business Address	Work Phone
Nicholas Shackley	Senior Vice President	4 Tri Harbor Court Port Washington, NY 11050	516-478-9545
Steven Rogers	General Counsel	4 Tri Harbor Court Port Washington, NY 11050	516-478-9514
Salvatore J. Gucionne	President and CEO	4 Tri Harbor Court	516-478-9518

		Port Washington, NY 11050	
Doug A. Roth	CFO	4 Tri Harbor Court Port Washington, NY 11050	516-478- 9540
Frank DeBenedittis	First V.P.	4 Tri Harbor Court Port Washington, NY 11050	516-478- 9527

If the Company has subsidiaries or affiliates, or is a subsidiary of another organization, identify th

- d. If the Company has subsidiaries or affiliates, or is a subsidiary of another organization, identify these related companies and state the name(s) and address(es) of the officer(s) of those organizations. Provide the same information for any further parent/subsidiary relationships.

RESPONSE:

See attached Exhibit 3 for a listing of Aceto subsidiaries and officers. Aceto Corporation is the ultimate parent company of all subsidiaries noted in Exhibit 3.

- e. If the Company is a successor to, or has been succeeded by, another, identify such other company and provide the same information requested above for the predecessor or successor company.

RESPONSE:

N/A

- f. If the Company transacted business with SBD in the name of an entity not already disclosed, give the name of such entity and state its relationship to the Company.

RESPONSE:

The Company has not transacted business with SBD, nor has it transacted business with SBD in the name of another entity.

2. a. Describe in detail the nature of your Company's business during the years 1974 to the present. If the nature of the business has not been constant, describe the

changes that have occurred, including any name changes, and when they occurred.

RESPONSE:

The Company, founded in 1947, is an international marketing, sales and distribution company organized into three business segments: Human Health, Pharmaceutical Ingredients and Performance Chemicals. The Company operates in nine countries, allowing it to source and supply products on a global basis.

- b. Describe your Company's operations from 1974 to the present and indentify all chemicals used or produced as a result of your Company's operations during that period, including any chemical substances used to clean equipment or machinery and the nature and chemical constituents of all waste streams and their disposition.

RESPONSE:

Aceto functions as a virtual manufacturing company distributing more than 1,100 chemical compounds used principally as raw materials or finished products in the pharmaceutical, agricultural, colors, inks, and general chemical industries. The identity of chemicals has varied over the years, therefore, the Company is not able to provide a list of all such chemicals distributed during the 40 years it has been in business. Also, Aceto is a distribution company and, as such, does not have chemical waste streams.

Company's Relationship to Superior Barrel and Drum ("SBD")

3. a. State whether the Company or any Company facility conducted any business transactions with SBD for the disposal, treatment, or storage of any barrels, drums, or other containers (hereinafter collectively referred to as "Containers").

RESPONSE:

To our knowledge, the Company has never conducted any business transactions with SBD for the disposal, treatment, or storage of any Containers. It is our understanding from the photographs provided by the United States Environmental Protection Agency (the "Agency") attached hereto as Exhibit 1 that a single drum with an Aceto label came to be located at the SBD Site. Since the Company has never had any dealings with SBD, the most practical explanation for the presence of drum at the SBD Site is that it was sent there, possibly by one of the Company's customers, after the Company sold its product to the customer.

The labeling on the drum identifies the contents as Benzophenone Flake. Attached hereto as Exhibit 2 is a list of customers to whom the Company sold Benzophenone Flake. According to the "Port of Destination" marked on the label, this drum was sent to a customer in Chicago, Illinois. Exhibit 2 identifies two customers located in Chicago to whom the Company sold this product.

- b. If so, identify each such facility and describe the relationship between the Company and SBD, including the nature of services rendered or products sold to the Company.

RESPONSE:

See response to Question 3(a).

- c. Provide copies of any contracts or agreements between the Company and SBD.

RESPONSE:

See response to Question 3(a).

- 4. a. For each facility identified in Question 3, state the nature of the operations conducted at the facility, including the time period in which the facility operated.

RESPONSE:

See response to Question 3(a).

- b. State the name, address, and current RCRA Identification Number of each facility.

RESPONSE:

See response to Question 3(a).

- 5. For each transaction between the Company and SBD, provide the following information, which may be provided in tabular format.

- a. Identify the specific dates of each transaction and the facility involved with each transaction. Where an exact date cannot be provided for a transaction, provide an approximation by month and year.

RESPONSE:

See response to Question 3(a).

- b. Identify the number of Containers that were the subject of each such transaction.

RESPONSE:

See response to Question 3(a).

- c. Generically describe each Container that was the subject of each such transaction, including the Container capacity and type (example: 55-gallon closed head steel drums, etc.).

RESPONSE:

See response to Question 3(a).

- d. Identify the intended purpose and nature of each such transaction (example: Company products sold to SBD, Company waste disposed of by SBD, Company products purchased from SBD, Services rendered to or from the Company to or from SBD, etc.).

RESPONSE:

See response to Question 3(a).

- e. State whether each Container that was the subject of the transaction contained any substance(s) at the time of the transaction. As to each Container that contained any substance:

RESPONSE:

See response to Question 3(a).

- (1) Identify each such substance, including its specific chemical constituent(s), physical state, quantity by volume and weight, and other characteristics; and

RESPONSE:

See response to Question 3(a).

- (2) Provide all written analyses that may have been generated for each such substance or which may be in the custody or control of the Company and all material safety data sheets, if any, relating to each such substance.

RESPONSE:

See response to Question 3(a).

6. Provide copies of all documents relating in any way to each transaction, including copies of delivery receipts, invoices, or payment devices.

RESPONSE:

See response to Question 3(a).

7. Identify all persons who might have knowledge of the transaction or who had any responsibility regarding the transaction.

RESPONSE:

See response to Question 3(a).

8. If you contend that any Container identified in response to Question 5, above, did not contain any substance at the time of the transaction, state whether such Container had previously been used by the Company to contain any substance, and if so:

- a. Identify all substances previously contained within such Container, including its specific chemical constituent(s), physical state, and other characteristic(s); and

RESPONSE:

See response to Question 3(a).

- b. Provide as to such substance(s), all written analyses that may have been generated for each such substance or which may be in the custody or control of the Company and all material safety data sheets, if any, relating to each such substance.

RESPONSE:

See response to Question 3(a).

9. Describe in detail any treatment of any Container that may have been performed by or on behalf of the Company prior to the time that the Container was transferred from the Company, including any process or procedure by which the Container was emptied or cleaned.

RESPONSE:

See response to Question 3(a).

10. If you sent any Container by means of any third party transporter, identify each such transporter, including the name and address of such transporter, and identify in which of the transactions such transporter acted.

RESPONSE:

See response to Question 3(a).

11. Identify each person consulted in responding to these questions and all questions on which he or she was consulted.

RESPONSE:

The following Aceto Corporation employees and agents were consulted in responding to this Request for Information:

- a) James Dillon, Aceto Consultant – Environmental & Regulatory Affairs
Address: 123 Vanderburgh Ave. Rutherford, NJ 07070
Telephone: (201) 870-2881
James Dillon was the Director of Environmental and Regulatory Affairs at Aceto from September 1993 to October 2005, and has been currently retained as Consultant – Environmental & Regulatory since 2005.
- b) Amy Rogers, Assistant Vice President/Director of Transportation
Address: 4 Tri Harbor Court Port Washington, NY 11050
Telephone: (516) 478-9581
Amy Rogers has been with Aceto for 22 years and responsible for transportation, logistics and warehousing.
- c) Suhey Francisco, Sr. Regulatory Affairs Specialist
Address: 4 Tri Harbor Court Port Washington, NY 11050
Telephone: (516) 478-9596
Suhey Francisco has been with Aceto for 6 years and is responsible for regulatory compliance and Environmental Health & Safety.
- d) Roy Goodman, Vice President, Performance Chemicals
Address: 4 Tri Harbor Court Port Washington, NY 11050
Telephone: (516) 478-9520
Roy Goodman has been with Aceto for 37 years and is a senior manager in the Performance Chemicals department responsible for sales of the subject product – Benzophenone Flake.
- e) Fred Trudwig, Jr., Sr. Technical Manager – AG. Protection Product
Address: 4 Tri Harbor Court Port Washington, NY 11050
Telephone: (516) 478-5569

Fred Trudwig, Jr. has been with Aceto for 10 years and was responsible for regulatory compliance and Environmental Health & Safety from 2003 to 2007. In 2007, he transferred to the Agricultural Products group where he is currently the Sr. Technical Manager for Aceto's herbicides, fungicides and insecticides products.

f) Michael DiBello, Esq., VP, Assistant General Counsel – Regulatory

Address: 4 Tri Harbor Court Port Washington, NY 11050

Telephone: (516) 478-9546

Michael DiBello has been with Aceto since 2012 as corporate counsel and head of Global Regulatory and QA, and responsible for environmental health and safety.

12. Identify any other person or entity (e.g., individual, company, partnership, etc.) having knowledge of the facts relating to the questions which are the subject of this inquiry. For each such person that you identify, provide the name, address, and telephone number of that person, and the basis of your belief that he or she has such knowledge. For the past and present employees, include their job title(s) and a description of the responsibilities.

RESPONSE:

The Company is not aware of any other person or entity having knowledge of the facts relating to the questions which are the subject of this inquiry.

13. Supply any additional information or documents that may be relevant or useful to identify other sources who disposed of or transported Containers to the Site.

RESPONSE:

The Company has no further information or documents that may be relevant or useful to identify other sources who may have disposed of or transported Containers to the SBD Site.

CERTIFICATION OF ANSWERS TO REQUEST FOR INFORMATION

Superior Barrel and Drum Site, Elk, Gloucester County, New Jersey

State of NEW YORK :

County of NASSAU :

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document (response to EPA Request for Information) and all documents submitted herewith, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete, and that all documents submitted herewith are complete and authentic unless otherwise indicated. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. I am also aware that I am under a continuing obligation to supplement my response to EPA's Request for Information if any additional information relevant to the matters addressed in EPA's Request for Information or my response thereto should become known or available to me.

MICHAEL DIBELLO

NAME (print or type)

VP, ASSOCIATE GENERAL COUNSEL - Regulatory

TITLE (print or type)



SIGNATURE

Sworn to before me this 7 day of
MARCH 2014


Notary Public

JULIET GRIFFITH
NOTARY PUBLIC-STATE OF NEW YORK
No: 01GR6270741
Qualified in Nassau County
My Commission Expires October 22, 2016



Label with illegible text, possibly a manufacturer's or inventory tag.

1266



EXHIBIT 1

2013 10 07



2013 10 07

2006

2013 10 07

...detailed information...
...recommended that you consult the Material Delivery AL...
...[119-61-9]...
...No information available...
...No information available...
...[redacted]...
...[redacted]...

EXHIBIT 2
PO-LOT CORRELATION

Warehouse Range: To: ZZZZZZZZZZ
Product Range: To: ZZZZZZZZZZ
PO Range: PO0024092 To: PO0024092
Lot/Batch Range: To: ZZZZZZZZZZ
Customer # Range: To: ZZZZZZZZZZ
Transaction Dt Range: 1/1/2011 To: 12/31/2014

Whse	Date	Transaction#	Transaction#	Customer	Ship to State	Status	Piece Qty	Packing	Quantity	UOM	Lot Cost	Value
Item: 3603900 BENZOPHENONE FLAKE												
PO0024092 ACETO SHANGHAI LTD.												
12041031												
580	5/31/12	REC0027025				A	40.00	200LD	8,000.0000	LB	1.69	13,501.99
580	6/11/12	SHP0105784	SO0100683	CHARKIT CHEMICAL CORPORATI	IL	A	-40.00	200LD	-8,000.0000	LB	1.69	-13,501.99
12041032												
580	5/31/12	REC0027025				A	40.00	200LD	8,000.0000	LB	1.69	13,501.99
580	6/11/12	SHP0105784	SO0100683	CHARKIT CHEMICAL CORPORATI	IL	A	-40.00	200LD	-8,000.0000	LB	1.69	-13,501.99
12041033												
580	5/31/12	REC0027025				A	40.00	200LD	8,000.0000	LB	1.69	13,501.99
580	6/5/12	SHP0105637	SO0100854	3M COMPANY	IL	A	-12.00	200LD	-2,400.0000	LB	1.69	-4,050.60
580	6/11/12	SHP0105784	SO0100683	CHARKIT CHEMICAL CORPORATI	IL	A	-28.00	200LD	-5,600.0000	LB	1.69	-9,451.39
12041034												
580	5/31/12	REC0027025				A	40.00	200LD	8,000.0000	LB	1.69	13,501.99
580	6/5/12	SHP0105732	SO0104189	MILLER INK TECHNOLOGY, INC.	CA	A	-2.00	200LD	-400.0000	LB	1.69	-675.10
580	6/5/12	SHP0105637	SO0100854	3M COMPANY	IL	A	-36.00	200LD	-7,200.0000	LB	1.69	-12,151.79
580	7/3/12	SHP0106627	SO0104920	VALSPAR SOURCING, INC.	MD	A	-2.00	200LD	-400.0000	LB	1.69	-675.10
12041035												
580	5/31/12	REC0027025				A	40.00	200LD	8,000.0000	LB	1.69	13,501.99
580	7/3/12	SHP0106627	SO0104920	VALSPAR SOURCING, INC.	MD	A	-9.00	200LD	-1,800.0000	LB	1.69	-3,037.95
580	7/12/12	SHP0106998	SO0105032	VALSPAR SOURCING, INC.	MD	A	-11.00	200LD	-2,200.0000	LB	1.69	-3,713.05
580	7/26/12	SHP0107474	SO0105121	VALSPAR SOURCING, INC.	NC	A	-10.00	200LD	-2,000.0000	LB	1.69	-3,375.50
580	9/4/12	SHP0108959	SO0105198	3M COMPANY	IL	A	-10.00	200LD	-2,000.0000	LB	1.69	-3,375.50
Total PO Qty in Inventory							PO0024092		0.00	0.0000	LB	0.00
Total Item:							3603900		0.00	0.0000	LB	0.00
Grand Total									0.0000	LB		0.00

ACETO CORPORATION

SUBSIDIARIES AND OFFICERS

2014

DOMESTIC

COMPANY	OFFICERS	TITLE	HOME ADDRESS	HOME PHONE
Aceto Corporation	Albert Ellender	Chairman & CEO	12714 Deacon's Place, Lakewood Ranch, FL, 34202	941-586-5023
4 Tri Harbor Court	Salvatore Guccione	President & COO	6 Ramkay Drive, Fairfield, NJ 07004	201-206-1439
Port Washington, NY 11050	Douglas Roth	Sr. VP-CFO, Asst. Secretary, Treasurer	9 Kimberly Drive, East Northport, NY 11731	631-368-6030
516-627-6000	Steven S. Rogers	Sr. VP, Secretary	11 Glenwood Rd., Tenafly, NJ 07670	201-541-6611
Aceto Agricultural Chemicals Corp.	Salvatore Guccione	Chairman	6 Ramkay Drive, Fairfield, NJ 07004	201-206-1439
4 Tri Harbor Court	Steven S. Rogers	Sr. VP, Secretary	11 Glenwood Rd., Tenafly, NJ 07670	201-541-6611
Port Washington, NY 11050	Douglas Roth	Secretary, Treasurer	9 Kimberly Drive, East Northport, NY 11731	631-368-6030
516-627-6000				
Aceto Pharma Corp.	Salvatore Guccione	President	6 Ramkay Drive, Fairfield, NJ 07004	201-206-1439
4 Tri Harbor Court	Frank DeBenedittis	1st Vice President	40 Somerset Place, Syosset, NY 11791	516-921-2462
Port Washington, NY 11050	Douglas Roth	Treasurer & Secretary	9 Kimberly Drive, East Northport, NY 11731	631-368-6030
516-627-6000				
Aceto Realty LLC	Salvatore Guccione	President	6 Ramkay Drive, Fairfield, NJ 07004	201-206-1439
4 Tri Harbor Court	Steven S. Rogers	Vice President & Secretary	11 Glenwood Rd., Tenafly, NJ 07670	201-541-6611
Port Washington, NY 11050	Douglas Roth	Vice President & Treasurer	9 Kimberly Drive, East Northport, NY 11731	631-368-6030
516-627-6000				
Acci Realty Corp.	Salvatore Guccione	President	6 Ramkay Drive, Fairfield, NJ 07004	201-206-1439
4 Tri Harbor Court	Douglas Roth	Secretary, Treasurer	9 Kimberly Drive, East Northport, NY 11731	631-368-6030
Port Washington, NY 11050				
516-627-6000				
Arsynco, Inc.	Salvatore Guccione	President	6 Ramkay Drive, Fairfield, NJ 07004	201-206-1439
4 Tri Harbor Court	Edward Kelly	Asst. Treasurer	24 Ryder Ave, Dix Hills, NY 11746	516-478-9512
Port Washington, NY 11050	Douglas Roth	Secretary, Treasurer	9 Kimberly Drive, East Northport, NY 11731	631-368-6030
516-627-6000				
Canegrass LLC	Michael Feinman	Manager	6934 Woodmore Terrace, Lakewood Ranch, FL, 34202	631-374-4462
Member Name:	Terry Kippley	Manager	360 Scudder Avenue, Northport, NY 11768	516-478-9537
Aceto Agricultural Chemicals Corp. - 30%	Bharat Dutia	Manager	Not Aceto Employees	
United Phosphorus Inc. - 70%	Beth Sears	Manager	Not Aceto Employees	
4 Tri Harbor Court				
Port Washington, NY 11050				
516-627-6000				
Rising Pharmaceuticals, Inc.	Salvatore Guccione	CEO	6 Ramkay Drive, Fairfield, NJ 07004	201-206-1439
(Name change effective Jan 3, 2011)	Satish Srinivasan	COO & President	42 Lockwood Drive, Princeton, NJ 08540	201-961-9000
3 Pearl Ct.	Frank DeBenedittis	Vice President	40 Somerset Place, Syosset, NY 11791	516-921-2462
Allendale, NJ 07401	Douglas Roth	VP, Treasurer & Secretary	9 Kimberly Drive, East Northport, NY 11731	631-368-6030
(201) 961-9000				

FOREIGN

COMPANY & ADDRESS	OFFICERS	TITLE	HOME ADDRESS	HOME PHONE
Aceto Agricultural Chemicals Corporation Ltd.	Salvatore Guccione	President	6 Ramkay Drive, Fairfield, NJ 07004	201-208-1439
Champion Allwoods Ltd.	Grace Gillard	Secretary	2 Chinston Close, Awilscombe Honiton, Devon EX14 3 GB United Kingdom	011-441-404-44625
2nd Fl. Refuge House				
Watergate Row South				
Chester, CH1 2LE				
Aceto Agricultural Chem. Corp. MX, S.de R.L. de C.V.	Michael Feinman	President	6934 Woodmore Terrace, Lakewood Ranch, FL, 34202	631-374-4462
Jorge Elliot #12-602	Salvatore Guccione	CEO	6 Ramkay Drive, Fairfield, NJ 07004	201-208-1439
Col. Polanco, Del. Miguel Hidalgo, C.P.	Douglas Roth	CFO	9 Kimberly Drive, East Northport, NY 11731	631-368-6030
11580 Mexico, D.F.				
Aceto Ltd. (Bermuda)	Salvatore Guccione	President	6 Ramkay Drive, Fairfield, NJ 07004	201-208-1439
Clarendon House	Douglas A. Roth	VP & Asst. Secretary	9 Kimberly Drive, East Northport, NY 11731	631-368-6030
2 Church Street	Susie Grant	Secretary	Not Aceto Employees	
Hamilton Hall, Bermuda	Malcolm S. Mitchell	Asst. Secretary	Not Aceto Employees	
Aceto B.V.	Jan Van Eis	Managing Director	Antoniestraat 69, Haarlem, 2011CP, The Netherlands	011-31-251-252322
Jan Lighartstraat 75 - 2nd Floor				
1964 HA				
Heemskerk, The Netherlands				
Aceto FineChem GmbH	Gunter Schenkel	CFO	Pinquinweg 17, 22527 Hamburg, Germany	011-49-40-2270260
Winterhuder Weg 27				
D - 22085 Hamburg, Germany				
Aceto France SAS	Philippe Potelle	Managing Director	210 Rue Du Vivier, Beynost, France 01700	011-33-623-06-7443
21 Boulevard Delessert				
F-75016 Paris				
France				
Aceto Health Ingredients GmbH	Gunter Schenkel	Managing Director	Pinquinweg 17, 22527 Hamburg, Germany	011-49-40-2270260
Winterhuder Weg 27				
D - 22085 Hamburg				
Germany				
Aceto (Holding) BV	Jan Van Eis	Managing Director	Antoniestraat 69, Haarlem, 2011CP, The Netherlands	011-31-251-252322
Jan Lighartstraat 75 - 2nd Floor				
1964 HA				
Heemskerk, The Netherlands				
Aceto Holding GmbH	Gunter Schenkel	Head Division Controlling	Pinquinweg 17, 22527 Hamburg, Germany	011-49-40-2270260
Klettgaustasse 21				
D - 79761 Waldshut-Tiengen				
Germany				
Aceto (Hong Kong) Limited	Gary J. Mo	Secretary	138 Qinghai Road, Suite 15A, Shanghai, China, Post Code 200041	011-86-21-6288-0099
8/F United A1-A2 Hoplite Ind. Ctre.				
3-5, Wang Tai Road				
Kowloon Bay				
Kowloon, Hong Kong				
Aceto Luxembourg S.a.r.L.	Salvatore Guccione	President	6 Ramkay Drive, Fairfield, NJ 07004	201-208-1439
36, rue Emile Mayrisch				
L-4240 Esch-sur-Alzette				

COMPANY & ADDRESS	OFFICERS	TITLE		
Aceto Pharma GmbH	Jurgen Philipps	Vice President	Hoehenweg 7, Moelin, Germany 23879	011-49-40-2270260
Winterhuder Weg 27	Gunter Schenkel	Vice President	Pinquinweg 17, 22527 Hamburg, Germany	011-49-40-2270260
D - 22085 Hamburg	Dr. Stephan Hornmuth	Vice President	Alfredstr. 61, 20535 Hamburg, Germany	011-49-40-2270260
Germany	Thomas Koch	Vice President	Erbseckamp 11, 22175 Hamburg, Germany	011-49-40-2270260
Aceto Pharma (India) Private Limited	Pradeep Thakur	General Manager	702, Maitri Abhang Sunil Nagar, Dombivli (East) 421201 India	011-91-251 2870605
504, Gateway Plaza				
Central Avenue road, Hiranadani Gardens				
Powai, Mumbai - 400 076				
INDIA				
Aceto Pte Ltd.	Pauline Sng Bee Guat	Managing Director	Blk 12 Dover Close East, #19-208, Singapore 130012	011-65-6296-0800
350 Orchard Road				
#16-05 Shaw House				
Singapore 238868				
Aceto (Shanghai) Ltd.	Gary J. Mo	Managing Director	138 Qinghai Road, Suite 15A, Shanghai, China, Post Code 200041	011-86-21-6288-0099
(name changed from Aceto Pharmaceutical (Shanghai) Ltd				
eff. 3/1/11)				
9/F Jing'an China Tower				
1701 Beijing Road West				
Shanghai, China 200040				
Pharma Waldhof GmbH	Gunter Schenkel	Vice President	Pinquinweg 17, 22527 Hamburg, Germany	011-49-40-2270260
Hansaallee 159	Dieter Schumann	Vice President	Stefan-Zweig-Weg 4441068 Moenchengladbach	011-49-(0) 2161-181683
D-40549 Dusseldorf				
Germany				
Plexvest Limited	No Officers			
7D Nikou Kranidioti Street (P.O. Box 27838)	No Officers			
Tower 4, Suite 302				
2411 Engomi, Nicosia (2433 Engomi, Nicosia)				
Cyprus				
(phone 35722313339)				
(fax 35722313346)				

UPS CampusShip: View/Print Label

1. Ensure there are no other shipping or tracking labels attached to your package. Select the Print button on the print dialog box that appears. Note: If your browser does not support this function select Print from the File menu to print the label.
2. Fold the printed sheet containing the label at the line so that the entire shipping label is visible. Place the label on a single side of the package and cover it completely with clear plastic shipping tape. Do not cover any seams or closures on the package with the label. Place the label in a UPS Shipping Pouch. If you do not have a pouch, affix the folded label using clear plastic shipping tape over the entire label.

3. GETTING YOUR SHIPMENT TO UPS

UPS locations include the UPS Store®, UPS drop boxes, UPS customer centers, authorized retail outlets and UPS drivers.

Schedule a same day or future day Pickup to have a UPS driver pickup all your CampusShip packages.




Hand the package to any UPS driver in your area.

Take your package to any location of The UPS Store®, UPS Drop Box, UPS Customer Center, UPS Alliances (Office Depot® or Staples®) or Authorized Shipping Outlet near you. Items sent via UPS Return Services(SM) (including via Ground) are also accepted at Drop Boxes. To find the location nearest you, please visit the Resources area of CampusShip and select UPS Locations.

Customers with a Daily Pickup

Your driver will pickup your shipment(s) as usual.

FOLD HERE

SHIP TO: MICHAEL DIBELLO 516-627-6000 523 ACEFO CORPORATION 4 TRI HARBOR CT PORT WASHINGTON NY 11050	1.0 LBS LTR 1 OF 1	NJ 089 9-02 	UPS NEXT DAY AIR SAVER 1P TRACKING #: 1Z E06 179 13 9446 5962		BILLING: P/P reason for shipment: EPA Response for SBD CS 16.1.04. WNTTB0-48.0A.01.2014	
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SENDER: COMPLETE THIS SECTION

- Complete Items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Aceto
4 Tri Harbor Ct.

Port Washington, NY 11050

Attn: Salvatore Guccione, President

21 JAN 12:31 PM

2. Article Number

(Transfer from service label)

COMPLETE THIS SECTION ON DELIVERY

A. Signature

x *R. Guccione* ☒ Agent
☐ Addressee

B. Received by (Printed Name)

R. Guccione

C. Date of Delivery

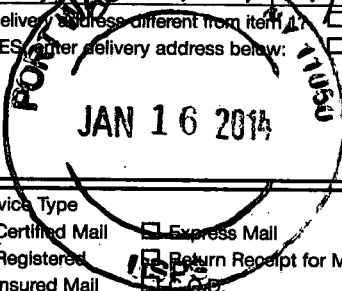
1/16

D. Is delivery address different from item 1?

☐ Yes

If YES, enter delivery address below:

☐ No



3. Service Type

☒ Certified Mail

☐ Express Mail

☐ Registered

☐ Return Receipt for Merchandise

☐ Insured Mail

☐ COD

4. Restricted Delivery? (Extra Fee)

☐ Yes

7012 1640 0001 8519 2647

UNITED STATES POSTAL SERVICE



First-Class Mail
Postage & Fees Paid
USPS
Permit No. G-10

- Sender: Please print your name, address, and ZIP+4 in this box •

Bonnie Hriczko
U.S. Environmental Protection Agency
Removal Action Branch-(MS-211)
Building 205
2890 Woodbridge Avenue
Edison, New Jersey 08837-3679

